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October 23, 2009

Honorable Ann Aiken  
Chief U.S. District Court Judge  
Wayne L. Morse U.S. Courthouse  
405 East Eighth Avenue, Room 2100  
Eugene, Oregon 97401

Re: *Huggins v. Stryker Corp.*, et al., U.S. District Court Case No. CV07-1671-AA

**October 1, 2009 Order clarifying disclosure of Dr. Matsen's  
University of Washington records**

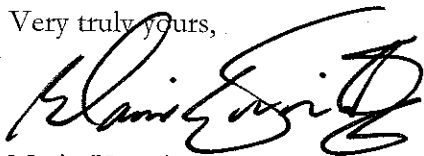
Dear Judge Aiken:

We received the Court's October 1 Order clarifying the Supplemental Protective Order entered September 22, 2009 in McClellan and Addis, and write simply to confirm that the term "expert(s)" now includes expert consultants (Huggins, 6:07-cv-1671, Order 10/1/09, Doc. No. 206).

The Williams Love office and my office informally reached this understanding prior to the Court's clarification because defendant Stryker has yet to disclose testifying "expert witnesses" in its oldest cases, Huggins and Butler. The disclosure date in those cases is December 4, 2009, and Stryker experts who address the Matsen U of W records are, at this stage, consulting experts who may not ultimately testify.

We will proceed on the foregoing basis and thank the Court for its attention.

Very truly yours,



Mario Horwitz  
Sedgwick, Detert, Moran & Arnold LLP

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